



FREEBORN MOWER

COOPERATIVE SERVICES

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November 2, 2012

Bill Grant, Deputy Commissioner
Department of Commerce, Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, MN 55101

Dear Deputy Commissioner Grant:

Freeborn-Mower Cooperative Services offers the following comments as requested following the Oct. 11, 2012 DG/Net Metering Workshop. FMCS fully supports positions on Distributed Generation and Net Metering previously submitted by the Minnesota Rural Electric Association. It isn't necessary to restate those here, as we believe these positions have been acknowledged by the Minnesota Division of Energy Resources. Freeborn-Mower Cooperative Services has been engaged in the discussion, attending DOC/DER workshops regarding DG assessment in 2011 and 2012, both in person and online.

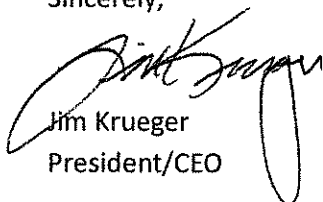
We would like to acknowledge that while Distributed Generation is certainly a small part of our system now with minimal impact, we are seeing continued interest and realize that will likely only increase so we need to be prepared for growth. Since mention was made several times at the Oct. 11 workshop that California is nearing its 5% cap on net metered DG, now is the right time for Minnesota to review its DG guidelines.

In just the last couple months, we have received new applications for two small solar photovoltaic systems and a 10 kW wind turbine, plus we have one existing wind project in the process. When these projects are complete, we will have nearly doubled the number of net-metered qualifying facilities on our system.

Also, in spite of overall small numbers, DG takes a disproportionate amount of time responding to inquiries; a minority result in actual projects. While this may be because of the process, the availability of more qualified contractors to assist in projects in our area of the state may mitigate this. Having a standard process in the state with agreed upon standards and application process does take away uncertainty. Annual reporting requirements also take a somewhat disproportionate amount of time.

Thank you for the opportunity to provide comment in this process and providing a participation framework for stakeholders.

Sincerely,



Jim Krueger
President/CEO